

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

DANIEL BLACK,

Plaintiff,

v.

Case No. 2:17-cv-00156-JPS

DAVID CLARKE,

Defendant.

**MOTION TO WITHDRAW AS COUNSEL OF RECORD
BY WILLIAM F. SULTON, ESQ.**

COMES NOW William F. Sulton, Esq., and moves the Court for an order permitting his withdrawal from this case as counsel of record for the plaintiff, Daniel Black (“Black”).

It is with great regret that I file this motion. But I must. The law firm of Peterson, Johnson & Murray, S.C. merged with von Briesen & Roper, s.c. The firm currently represents Milwaukee County and so there is a concurrent conflict of interest. I did not always have that view. I was counseled that if the county was dismissed from the lawsuit there would be no conflict. That happened, but was then told counseled that a conflict nevertheless exists because the county would have to pay any judgment awarded by a jury. I was later told that the county may be willing to waive the conflict. I am now being told that it will not. And so I must withdraw.

By granting this motion the Court will not have to adjourn the trial because Dr. Anne T. Sulton, Esq. (“Dr. Sulton”) will represent the plaintiff at trial. The National Association for the Advancement of Colored People (“NAACP”) presented Dr. Sulton with the William

Robert Ming award in 2007, the most coveted award a civil rights attorney can receive. Dr. Sulton was one of only 47 women lawyers featured by the American Bar Association (“ABA”) in “Grit, the Secret to Advancement: Stories of Successful Women Lawyers.” (available at

<https://shop.americanbar.org/eBus/Store/ProductDetails.aspx?productId=276966937&term=4920049>). Dr. Sulton is also a criminologist, having received her Ph.D. in criminology and criminal justice in 1984. Among her published works is *African American Perspectives on Crime Causation, Criminal Justice Administration and Crime Prevention*, published by Butterworth-Heinemann in 1996, which is recognized by the Library of Congress (per 44 U.S.C. 1333 – 104th Congress, 2d Session / Senate Document 104-20). She is eminently qualified to represent the plaintiff at trial.

For all of the above reasons, William Sulton respectfully requests an order permitting his withdrawal as counsel of record.

Dated in Milwaukee, Wisconsin, this 17th day of January, 2018.

/s/ William F. Sulton, Esq.
WILLIAM F. SULTON, ESQ.
State Bar No. 1070600

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CERTIFICATE OF SERVICE

I hereby certify that on January 17, 2018, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Eastern District of Wisconsin by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ William F. Sulton, Esq.

WILLIAM F. SULTON, ESQ.
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